

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

**BAY STATE GAS COMPANY**

**D.T.E. 05-27**

ATTORNEY GENERAL'S THIRD SET OF  
DOCUMENT AND INFORMATION REQUESTS

The following are the THIRD SET of discovery and information requests regarding the prefiled testimony of Mr. Skirtich

- AG-3-1 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 4, lines 1-15, for 2004 Payroll Overtime, please provide a schedule similar to this one to calculate the monthly adjustments for straight time wages for the test year.
- AG-3-2 Please reconcile the 2004 Total Payroll amount shown on Exhibit BSG/JES-1, Schedule JES-6, page 2, line 6 with the amount shown on page 47, line 45 of the Company's 2004 Annual Return to the Department.
- AG-3-3 Please provide the number of Company part-time employees at the end of each month for the years 1997 through 2005 by employee group (e.g. union, clerical, management).
- AG-3-4 Please provide a complete and detailed description of the benefits available to part-time employees along with a comparison of each of those benefits to those of full-time employees.
- AG-3-5 Please provide the average test-year cost per part-time employee of each of the benefits available to part-time employees.
- AG-3-6 Please provide the average test-year cost per full-time employee of each of the benefits available to full-time employees.

- AG-3-7 Please provide a complete and detailed description of any plans or proposals to restructure, reorganize, downsize, and / or outsource any of the Company's functions. Please also provide copies of any such plans made to management, along with all memoranda, e-mails, analyses, and cost / benefit analyses regarding any such plans.
- AG-3-8 Please provide a complete and detailed description of any plans or proposals to restructure, reorganize, downsize, and / or outsource any of the Service Company's functions. Please also provide copies of any such plans made to management, along with all memoranda, e-mails, analyses, and cost / benefit analyses regarding any such plans.
- AG-3-9 Please provide the workpapers, calculations, formulas, assumptions, subaccount entries and supporting documentation used to determine the "Bay State Portion" percentages for each type of coverage shown on Exhibit BSG/JES-1, Workpaper JES-6, page 17, Column (3) .
- AG-3-10 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 19, please itemize and quantify all General Liability claims during the years 2000 through 2004 that are \$50,000 or greater and provide a complete and detailed description of the nature of the liabilities surrounding the claims.
- AG-3-11 Please provide the Company's Workers Compensation Self-Insurance Claims for each of the last five-years.
- AG-3-12 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 20, line 6, please provide a copy of the letter of engagement as well all work product and invoices to date as a result of that engagement.
- AG-3-13 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 20, line 7, please provide a copy of the letter of engagement as well all work product and invoices to date as a result of that engagement.
- AG-3-14 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 20, line 8, please provide a copy of the letter of engagement as well all work product and invoices to date as a result of that engagement.
- AG-3-15 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 20, line 9, please provide a copy of the letter of engagement as well all work product and invoices to date as a result of that engagement.

- AG-3-16 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 20, line 10, please provide a copy of the letter of engagement as well all work product and invoices to date as a result of that engagement.
- AG-3-17 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 20, line 11, please provide a copy of the letter of engagement as well all work product and invoices to date as a result of that engagement.
- AG-3-18 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 20, line 12, please provide a copy of the letter of engagement as well all work product and invoices to date as a result of that engagement.
- AG-3-19 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 20, line 13, please provide a copy of the letter of engagement as well all work product and invoices to date as a result of that engagement.
- AG-3-20 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 20, line 14, please provide a copy of the letter of engagement as well all work product and invoices to date as a result of that engagement.
- AG-3-21 Please reconcile the “Total Income Statement” Bad Debt Accrual amount of \$8,244,660, shown on Exhibit BSG/JES-1, Workpaper JES-6, page 21, line 42 with the Uncollectible accounts amount shown in the Company’s 2004 Annual Return to the Department, page 47, line 6.
- AG-3-22 Exhibit BSG/JES-1, Workpaper JES-6, page 25, line 8 refers to Exhibit BSG/JES-1, Workpaper JES-18, page 1 of 8, line 26, please provide a copy of that Exhibit BSG/JES-1, Workpaper JES-18, along with Workpapers JES-14, 15, 16, 17, and any other workpapers that were not provided with the Company’s original filing.
- AG-3-23 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 24, lines 1, please provide the following information regarding the NISOURCE Corporate Services:
- (1) a five-year history of the total NISOURCE Corporate Services Payroll;
  - (2) a five-year history of the NISOURCE Corporate Services Payroll Allocated to Bay State Gas Company;
  - (3) a five-year history of the NISOURCE Corporate Services Payroll Allocated to Bay State Gas Company and capitalized; and
  - (4) a five-year history of the NISOURCE Corporate Services Payroll Allocated to Bay State that was then allocated / assigned to Northern Utilities and to other entities.

- AG-3-24 Referring to Exhibit BSG/JES-1, Workpaper JES-6, page 28, please provide a complete and detailed description of the nature of the “Co. 12 Charges” indicated in Column (8).
- AG-3-25 Referring to Exhibit BSG/JES-1, Schedule JES-6, page 14, line 5, please provide the invoices associated with the Test Year Postage Expense.
- AG-3-26 Referring to Exhibit BSG/JES-1, Schedule JES-6, page 20, lines 2 and 3, please provide complete copies of the source documents for the numbers indicated on those lines.
- AG-3-27 Referring to Exhibit BSG/JES-1, Workpaper JES-7, page 1, line 12, please itemize for each location the Property, Plant and Equipment by account.
- AG-3-28 Referring to Exhibit BSG/JES-1, Workpaper JES-7, page 1, line 18, please provide the following information:
- (1) a complete and detailed description of the term “Bay State - Northern Allocation Percentages;”
  - (2) the workpapers, calculations, formulas, assumptions, and supporting documentation for the amounts shown on that line for each location; and
  - (3) the identities of those other entities to which those costs are allocated as well as the percentage allocated to each.
- AG-3-29 Referring to Exhibit BSG/JES-1, Workpaper JES-7, page 1, line 21, please the workpapers, calculations, formulas, assumptions, and supporting documentation for the amount shown on that line.
- AG-3-30 Referring to Exhibit BSG/JES-1, Workpaper JES-7, page 2, please provide the job orders and closing reports for each of the projects indicated on that page.
- AG-3-31 Referring to Exhibit BSG/JES-1, Schedule JES-8, page 3, line 2, please indicate the number of METSCAN devices that were in service for each rate class as of the end of the test year in this case.
- AG-3-32 Please provide the Company’s cost/benefit analysis used in its determination to retire the METSCAN devices. Please also provide all Company memorandum concern their replacement.
- AG-3-33 Please provide a complete and detailed description of the Company’s efforts to mitigate the costs of the METSCAN devices.

- AG-3-34 Referring to Exhibit BSG/JES-1, Schedule JES-8, page 3, line 4, please provide a copy of the Fleet Operating Lease(s), along with all amendments thereto.
- AG-3-35 Referring to Exhibit BSG/JES-1, Schedule JES-8, page 3, line 2, please itemize and quantify the “Capital” retired on March 5 by plant account / subaccount.
- AG-3-36 Referring to Exhibit BSG/JES-1, Schedule JES-9, page 3, please provide the property tax bills associated with the following communities:
- (1) Brockton
  - (2) Chicopee
  - (3) Lawrence
  - (4) Springfield
  - (5) West Springfield.
- AG-3-37 Referring to Exhibit BSG/JES-1, Workpaper JES-11, page 1, please provide all of the workpapers, calculations, formulas, assumptions, and supporting documentation for the “Update for 1992 Difference” shown on line 9.
- AG-3-38 Referring to Exhibit BSG/JES-1, Workpaper JES-11, page 1, please provide all of the original workpapers, calculations, formulas, assumptions, and supporting documentation for the original D.P.U. 92-111 South Georgia Amortization.
- AG-3-39 Referring to Exhibit BSG/JES-4, line 2, please provide all of the workpapers, calculations, formulas, assumptions, studies, reports and supporting documentation for the Gross Pension amount shown on that line.
- AG-3-40 Referring to Exhibit BSG/JES-4, line 14, please provide all of the workpapers, calculations, formulas, assumptions, studies, reports and supporting documentation for the Gross PBOP amount shown on that line.
- AG-3-41 Please provide the following information regarding the Company’s corporate office:
- (1) the lease expense amount included in the cost of service in this case;
  - (2) an itemization and quantification of the test year level of annual operations and maintenance expenses and property taxes for that office;
  - (3) the current number of Company employees at the office;
  - (4) a scaled diagram of the office with indications of the space that is currently occupied by Company personnel and that which is currently unoccupied; and
  - (5) the gross revenue from any use and / or transfer of rights to use the facilities by others.

AG-3-42 Referring to Exhibit BSG/JES-1, Schedule 6, page 7, please provide the following information regarding the Sales of the Westborough Building and Land:

- (1) a copy of the purchase and sale agreement along with all other associated amendments and agreements thereto;
- (2) a copy of all subsequent leases and / or agreements for use of the facility by the Company;
- (3) the cost / benefit analysis associated with the sale that was used by the Company in its decision to sell the facility;
- (4) an itemization and quantification of the current annual costs of the facility to the Company;
- (5) copies of all bids for purchasing the facility; and
- (6) copies of all market valuation of the facilities done by / for the Company.

AG-3-43 Referring to Exhibit BSG/JES-1, Schedule 6, page 7, please provide the following information regarding the Sales of the LNG Trailers:

- (1) a copy of the purchase and sale agreement along with all other associated amendments and agreements thereto;
- (2) a copy of all subsequent leases and / or agreements for use of the facility by the Company;
- (3) the cost / benefit analysis associated with the sale that was used by the Company in its decision to sell the facility;
- (4) an itemization and quantification of the current annual costs of the facility to the Company;
- (5) copies of all bids for purchasing the facility; and
- (6) copies of all market valuation of the facilities done by / for the Company.

AG-3-44 Referring to Exhibit BSG/JES-1, Schedule 6, page 7, please provide the following information regarding the Sales of the Propane Properties:

- (1) a copy of the purchase and sale agreement along with all other associated amendments and agreements thereto;
- (2) a copy of all subsequent leases and / or agreements for use of the facility by the Company;
- (3) the cost / benefit analysis associated with the sale that was used by the Company in its decision to sell the facility;
- (4) an itemization and quantification of the current annual costs of the facility to the Company;
- (5) copies of all bids for purchasing the facility; and
- (6) copies of all market valuation of the facilities done by / for the Company.

AG-3-45 Referring to Exhibit BSG/JES-1, Schedule 6, page 7, please provide the following information regarding the Sale of the Water Heaters:

- (1) a copy of the purchase and sale agreement along with all other associated amendments and agreements thereto;
- (2) a copy of all subsequent leases and / or agreements for use of the facility by the Company;
- (3) the cost / benefit analysis associated with the sale that was used by the Company in its decision to sell the facility;
- (4) an itemization and quantification of the current annual costs of the facility to the Company;
- (5) copies of all bids for purchasing the facility; and
- (6) copies of all market valuation of the facilities done by / for the Company.

Dated: May 10, 2005